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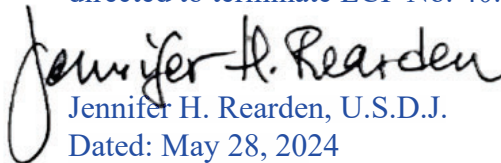
THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

May 24, 2024

BY ECF

Honorable Jennifer H. Rearden
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. Any forthcoming motion for summary judgment shall be filed by **July 1, 2024**. The Clerk of Court is directed to terminate ECF No. 40. SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Dated: May 28, 2024

Re: Sabrina Toner v. City of New York, et al.
22 Civ. 1354 (JHR)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York, and attorney for defendants City of New York, Parks Enforcement Patrol (“PEP”) Officer Jonathan Martinez, and PEP Officer Steve Gauvy (collectively referred to as “defendants”) in the above-referenced matter. The defendants write to respectfully request an extension from May 31, 2024 until July 1, 2024 for defendants to file a partial motion for summary judgment. This is defendants’ first such request and plaintiff’s counsel consents. This request does not affect any other deadlines.

By way of background, as noted previously, the parties have been communicating with respect to narrowing the claims in this case and determining which claims, if any, can be voluntarily dismissed. *See* Dkt. No. 39, Letter, May 3, 2024. The parties have been continuing those discussions, which are nearing completion, and it appears the defendants may still be moving on certain claims. The defendants request this additional time because the undersigned has been out sick multiple days this week, has several deadlines for dispositive motion practice in June, and has previously scheduled leave from June 17, 2024 through June 20, 2024.

Accordingly, the defendants request, with plaintiff’s consent, the Court grant an extension from May 31, 2024 until July 1, 2024 for defendants to file a partial motion for summary judgment.

The defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino

Senior Counsel

Special Federal Litigation Division

cc: **By ECF**

Brett H. Klein, Esq.

Lissa Green-Stark, Esq.

Attorneys for Plaintiff